

Privacy Notice – Visitors, suppliers, third parties

Reviewed: September 2020



Privacy notice for visitors, suppliers and other third parties who have contact with the Russell Education Trust and/or the Trust's individual schools.

1. Background

This Russell Education Trust ('the Trust') Privacy Notice applies to all personal data held by the Trust as a multi-academy trust and by individual schools in the Trust.

The Trust aims to ensure that all personal data collected by the Trust and in its individual schools is collected, stored and processed in accordance with the [General Data Protection Regulation \(EU\) 2016/679 \(GDPR\)](#) and the Data Protection Act 2018 (DPA 2018) .

You have a right to be informed about how we use any personal data that we hold about you. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice applies to individuals such as visitors to the Trust or our schools and suppliers of goods and services who we work with, whom we collect, store and use personal data about. (There are separate privacy notices for our parents and carers, students, the school workforce, school governors, trustees and volunteers and alumni). This privacy notice is intended for but is not limited to individuals in the categories listed below or who work for any of the following:

- Our suppliers e.g. any individuals involved in providing contracts for goods and services
- Our regulators, lawyers, insurers, auditors, professional advisors and other professional contacts
- Visitors to the Trust or our school premises
- Individuals involved with commercial lettings at our school premises
- Others who get in touch with us, e.g. with questions, complaints, feedback (in this instance we expect that the individual will be in control of the personal information they wish to provide to us)
- Visitors to our Trust or school websites and sixth form websites

The Russell Education Trust, Manor House, 1 The Crescent, Leatherhead, Surrey, KT22 8 is the 'data controller' for the purposes of data protection law.

Our data protection officer is: Jo Townsend (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact information for individuals such as name, address, email address, contact numbers
- Personal identification to enable the identity of individuals to be verified for safeguarding reasons
- Information relating to a visit e.g. company or organisation name, car registration number
- References and CVs or employment history if collected as part of a tender or bidding process
- Any other personal information needed to fulfil a contract we have with you
- Information about an individual's personal situation or professional capacity
- Information about individuals employed or associated with our suppliers/advisors
- Payment information such as bank details
- Website data via the use of cookies, which store certain data such as IP addresses, time of visit etc

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We may also collect, use, store and share (where appropriate) information about you that falls into “special categories” of more sensitive personal data. This includes but is not restricted to information about:

- Access arrangements that need to be made
- Dietary requirements which may include health conditions
- Photographs for identification purposes
- CCTV images captured by the Trust or in our school premises

For safeguarding reasons, we may also need to ask to see your Disclosure and Barring Service (DBS) Certificate, if applicable.

We may also hold data about you that we have received from other organisations, including businesses you have dealt with, schools and social services.

3. Why we use this data

We use the data listed above to:

- Identify you while at any of our premises
- Protect your health and safety and the health and safety of others at our schools e.g. staff and students
- Maintain accurate records of visitors to the Trust and our schools
- Provide appropriate access arrangements
- Decide whether to enter into a contract with you
- Fulfil the terms of our contract with you, including payment
- Keep an accurate record of the suppliers we use
- To facilitate the day-to-day operation of contracts such as billing, payments, internal record keeping, auditing and complaints handling.
- To comply with legal obligations and disclosures required/permitted by law.
- To support the provision of professional advice where we may have sought this or to respond to legal claims.
- To facilitate and support lettings of our premises and the day-to-day operation of these agreements such as personal identity information, billing, payments, internal record keeping and complaints handling.
- To help us answer questions from the public and deal with complaints.
- In respect of personal ID information and CCTV - To safeguard our premises, students and staff.
- In relation to Cookies and IP information- to support use of our website and improve our website service.

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send marketing information by email or text promoting school events, campaigns and charitable causes or services that may be of interest to you.

You can withdraw your consent or ‘opt out’ of receiving these emails and/or texts at any time by contacting the individual school or the Trust.

3.2 Use of your personal data in automated decision making and profiling

We do not currently process your personal data through automated decision making or profiling. If this changes in future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in 3. above are as follows:

- We need to process the information to fulfil our contract with you or to take steps you ask of us before entering into a contract with you
- We need to comply with a legal obligation – this means that we need to process the data to meet our responsibilities under law
- We need it to perform a task in the public interest – this means we need to use your data to fulfil our official functions
- You have given us specific and explicit consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests) – for example in a medical emergency
- We have legitimate interests in processing the data where there is minimal privacy impact and we have a compelling reason to do so.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds, which justify the use of your data.

4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it where we have both a lawful basis, as set out above and one of the following conditions for processing as set out in data protection law:

- We have obtained your specific and explicit consent to use your information in a certain way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- We need to process if for reasons of substantial public interest as defined in legislation
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to use it for health or social care purposes and it is used by or under the direction of a professional obliged to confidentiality under the law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving or for statistical purposes, and the processing is in the public interest.

Some of the reasons listed above for collecting and using your personal information overlap, and there may be several grounds, which justify our use of this data.

For criminal offence data, we will only collect and use it where the law allows us to do so and in accordance with data protection law.

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5. Collecting this information

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Other third parties who you have dealt with

6. How we store this data

We keep personal information about you while you work with our schools/the Trust. We may also keep it beyond your work with us, if this is necessary.

We maintain a Data Retention Schedule which explains how long we will hold your personal information. You can request a copy of this from the Trust.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your data securely when we no longer need it.

7. Who we share data with

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Local authorities – to meet our obligations to share certain information, such as safeguarding concerns
- Government departments or agencies
- Governors as required to support their involvement in the governance of the Trust and our schools
- Third party providers such as IT service providers
- Professional advisors and consultants who work with the Trust/our schools.
- Police forces/Courts/Regulatory bodies
- Other Russell Education Trust schools and the Trust's central team to support the effective management and operation of our schools, for example to facilitate benchmarking exercises.
- Our internal and external auditors - to meet our legal obligations to have our accounts audited in accordance with legislation
- Survey and research organisations – to support the collation of data to support the improvement of education across the country.

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- Health authorities and health and social welfare organisations– to meet our obligations to protect the welfare of the school community. This includes NHS Test and Trace/Public Health England in relation to Coronavirus (Covid 19) where necessary, after you have visited one of our schools or the Trust's offices.
- Security organisations – to ensure that our staff and students are as safe as possible and to meet our obligations and duties under legislation
- Educators and examining bodies – to support the successful education of our students including the proper coordination of their examination entries.
- Our regulator e.g. Ofsted to meet our obligations under the legislative framework for the monitoring and evaluation and assessment of our schools.
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations – to meet financial commitments and to ensure the effective working of our financial systems.

7.1 Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting our schools/the Trust.

8. Your rights

8.1 How to access the personal information we hold about you

You have a right to make a 'subject access request' to gain access to personal information we hold about you.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact us (see 'contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing

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- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- **Data Protection Officer:** Jo Townsend
- **Email address:** DPO@Russelleducationtrust.org.uk
- **Address:** Data Protection Officer, Russell Education Trust, Manor House, The Crescent, Leatherhead, Surrey, KT22 8DY. Please mark private and confidential for the attention of the Data Protection Officer.